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9 *Attorneys for Defendant, Nissan Motor Acceptance*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 EDWARD MERCHANT,

10 Plaintiffs,

11 vs.

12 NISSAN MOTOR ACCEPTANCE COMPANY,
13 LLC; EXPERIAN INFORMATION
14 SOLUTIONS, INC.; EQUIFAX
15 INFORMATION SERVICES, LLC; and
16 TRANS UNION LLC,

17 Defendants.

Case No.: 2:23-cv-00036-MMD-DJA

**STIPULATION TO EXTEND TIME
(FIRST REQUEST)**

18 Pursuant to F.R.C.P. 6 and Local Rule 6-1 of the U.S. District Court Rules, the undersigned,
19 Jory C. Garabedian, Esq., of the law firm of WRIGHT FINLAY & ZAK, LLP, as counsel of record
20 for Defendant, Nissan Motor Acceptance Company LLC ("NMAC") and Michael Yancey III of
21 the law firm of PRICE LAW GROUP, APC, as counsel of record for Plaintiff, Edward Merchant,
22 hereby stipulate that NMAC shall file its response to the underlying Complaint by February 21,
23 2023 and states as follows:

- 24 1. No previous extensions have been requested.
- 25 2. Plaintiff filed his underlying Complaint in this action on January 6, 2023.
- 26 3. NMAC was served on January 10, 2023. It's deadline to respond is January 31, 2023.
- 27 4. NMAC requires additional time to adequately investigate and respond to the allegations in
28 this Complaint. The parties are further exploring potential resolution.
5. The parties agreed that NMAC will have until February 21, 2023 to file its response.
6. The extension will not affect any other deadlines or prejudice any party.

1 IT IS SO STIPULATED.

2 Dated: January 31, 2023

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4 WRIGHT, FINLAY & ZAK, LLP

5 /s/ Jory C. Garabedian

6 Jory C. Garabedian, Esq.

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10 PRICE LAW GROUP, APC

11 Michael Yancey III

12 Michael Yancey III

13 Nevada Bar No. 16158

5940 S Rainbow Blvd., Suite 3014

Las Vegas, Nevada 89118

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16 IT IS SO ORDERED:

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19 DANIEL J. ALBREGTS
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: February 1, 2023
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **STIPULATION TO EXTEND TIME** on the 31st day of January, 2023, to all parties on the CM/ECF service list.

/s/ Tonya Sessions
An Employee of WRIGHT, FINLAY & ZAK, LLP